

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LIMITED  v.  FORTINET, INC.	Case No. 2:22-cv-00322-JRG-RSP  (Lead Case)  <b>JURY TRIAL DEMANDED</b>
<hr/> LIONRA TECHNOLOGIES LIMITED  v.  CISCO SYSTEMS, INC.	Case No. 2:22-cv-00305-JRG-RSP  (Member Case)
<hr/> LIONRA TECHNOLOGIES LIMITED  v.  PALO ALTO NETWORKS, INC.	Case No. 2:22-cv-00334-JRG-RSP  (Member Case)

**JOINT MOTION REGARDING STIPULATION OF  
DISMISSAL OF CERTAIN ASSERTED PATENTS BY  
LIONRA TECHNOLOGIES LIMITED AND FORTINET, INC.**

Plaintiff Lionra Technologies Limited (“Lionra”), together with Defendant Fortinet, Inc. (“Fortinet”), respectfully submit this Joint Motion requesting that the Court adopt and enter the Joint Stipulation between Lionra and Fortinet regarding the dismissal of certain asserted patents, submitted as Exhibit A to this Motion, in accordance with the Second Amended Docket Control Order (Dkt. No. 160) and following the Court’s November 27, 2023 Claim Construction Order (Dkt. No. 162).

Pursuant to Federal Rule of Civil Procedure 41(a)(2), the parties further request that the Court enter the proposed order attached as Exhibit B to this Motion dismissing Lionra’s claims for infringement of U.S. Patent No. 7,302,708 (“the ’708 patent”) and U.S. Patent No. 7,921,323 (“the ’323 patent”) against Fortinet based on Fortinet’s manufacture, importation, use, sale and/or offer for sale of any accused Fortinet products.

For the reasons set forth herein, Lionra and Fortinet respectfully request that the Court grant this Joint Motion to (1) adopt and enter the Stipulation attached as Exhibit A and (2) enter the proposed order dismissing the claims for infringement of the '708 patent and the '323 patent.

Dated: December 1, 2023

Respectfully submitted,

By: /s/ Brett Cooper

Brett E. Cooper (NY SBN 4011011)  
bcooper@bc-lawgroup.com  
Seth Hasenour (TX SBN 24059910)  
shasenour@bc-lawgroup.com  
Jonathan Yim (TX SBN 24066317)  
jyim@bc-lawgroup.com  
Drew B. Hollander (NY SBN 5378096)  
dhollander@bc-lawgroup.com

**BC LAW GROUP, P.C.**  
200 Madison Avenue, 24th Floor  
New York, NY 10016  
Tel.: (212) 951-0100  
Fax: (646) 293-2201

**ATTORNEYS FOR PLAINTIFF  
LIONRA TECHNOLOGIES LTD.**

By: /s/ Dravid Dotson

Melissa R. Smith (TBN 24001351)  
melissa@gillamsmithlaw.com  
**GILLAM & SMITH, LLP**  
303 South Washington Avenue  
Marshall, TX 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

Matthew C. Gaudet  
mcgaudet@duanemorris.com  
David C. Dotson  
dcdotson@duanemorris.com  
Alice E. Snedeker  
aesnedeker@duanemorris.com  
Daniel Mitchell  
dmitchell@duanemorris.com  
**DUANE MORRIS LLP**  
1075 Peachtree Street, N.E., Suite 1700  
Atlanta, Georgia 30309-3929  
Telephone: 404.253.6900  
Facsimile: 404.253.6901

Alexandra Lane  
axlane@duanemorris.com  
**DUANE MORRIS LLP**  
1540 Broadway  
New York, NY 10036  
Telephone: 212.471.4772  
Facsimile: 212.937.3568

**ATTORNEYS FOR DEFENDANT  
FORTINET, INC.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Brett Cooper  
Brett Cooper

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Parties complied with the meet and confer requirement in Local Rule CV-7(h) on December 1, 2023, and the Parties are in agreement as to this Motion's substance, as indicated by the signatures of counsel for all Parties.

/s/ Brett Cooper  
Brett Cooper